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BELLSOUTH TELECOMMUNICATIONS, INC.  
REBUTTAL TESTIMONY OF ALFRED HEARTLEY  
BEFORE THE TENNESSEE REGULATORY AUTHORITY  
DOCKET NO. 97-00309  
July 22, 2002

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.

A. My name is Alfred Heartley. My business address is 675 West Peachtree Street, Atlanta, Georgia. I am employed by BellSouth in the Network Services organization.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my testimony is to respond to the rebuttal testimony of Sherry Lichtenberg on behalf of Worldcom (at pages 14-15) alleging that BellSouth has not shown that its Legacy Systems, RSAG and ATLAS, its manual work groups, its documentation, or its provisioning and maintenance and repair processes are regional.

Q. WHAT IS YOUR RESPONSE TO MS. LICHTENBERG STATEMENTS ON THE REGIONALITY OF BELLSOUTH'S OSS?

1 A. My response to Ms. Lichtenberg statements is contained in my 5 state affidavit filed with  
2 the Federal Communications Commission ("FCC") on June 20, 2002. In the affidavit I  
3 explain the regionality of BellSouth's provisioning and maintenance and repair processes  
4 along with the legacy systems, training and documentation that support these processes.  
5 To the extent that the affidavit compares matters in Alabama, Kentucky, Mississippi,  
6 North Carolina, and South Carolina to matters in Georgia and Louisiana, the same  
7 comparisons hold true when matters in Tennessee are compared to matters in Georgia  
8 and Louisiana. A copy of my affidavit is attached as Exhibit AH-1  
9

10 Q. PARAGRAPH 12 OF THE AFFIDAVIT IDENTIFIES THE LOCATION OF THE  
11 ADDRESS/FACILITY INVENTORY GROUP ("AFIG") AND THE WORK  
12 MANAGEMENT CENTER ("WMC") IN CERTAIN STATES. IS THERE AN AFIG  
13 AND A WMC IN TENNESSEE?  
14

15 A. Yes. As I indicated in the direct testimony I fled in Docket No. 01-00362, an AFIG is  
16 located in Nashville and a WMC is located in Knoxville.  
17

18 Q. PARAGRAPH 13 OF THE AFFIDAVIT IDENTIFIES THE LOCATION OF THE  
19 CIRCUIT PROVISIONING GROUP ("CPG") IN CERTAIN STATES. IS THERE A  
20 CPG IN TENNESSEE?  
21

22 A. Yes. As I indicated in the direct testimony I filed in Docket No. 01-00362, a CPG is  
23 located in Nashville.

1

2 Q. THE AFFIDAVIT MAKES VARIOUS REFERENCES TO THE STACY AFFIDAVIT  
3 AND THE AINSWORTH AFFIDAVIT (SEE, E.G., PARAGRAPHS 2, 21, 24, AND  
4 42). PLEASE ELABORATE ON THESE REFERENCES.

5

6 A. These are references to the 5 state affidavits of William Stacy and Ken Ainsworth that  
7 were filed with the FCC on June 20, 2002. Mr. Pate and Mr. Ainsworth attached these  
8 affidavits to the rebuttal testimony they submitted in this docket.

9

10 Q. THE AFFIDAVIT MAKES REFERENCES TO MANY ACRONYMS. DO YOU  
11 HAVE A LIST OF THOSE ACRONYMS?

12

13 A. I have attached a list of acronyms to my testimony for the Authority's information. Please  
14 see Exhibit AH-2

15

16 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17

18 A. Yes, it does.

19

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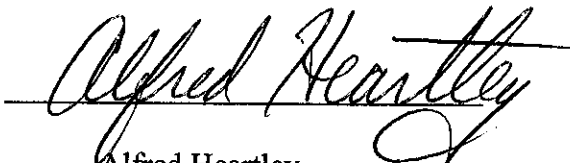
21 455316

AFFIDAVIT

STATE OF: Georgia  
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Alfred Heartley –General Manager – Wholesale Performance, Trapper and EUM, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 97-00309 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 3 pages and 2 exhibit(s).

  
Alfred Heartley

Sworn to and subscribed  
before me on July 22, 2002

  
NOTARY PUBLIC

Notary Public, Gwinnett County, Georgia  
My Commission Expires June 27, 2005